Responses to Comments in Letter 5 from John McKay, Bellingham Resident

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the preceding comment letter.

1. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Therefore, potential issues related to electrical grounding of buildings along the 115 kV routes no longer apply.

2. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Therefore, removal of trees along the Nooksack River to install 115 kV lines would not be required.

3. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project.

4. Please see General Response E, which addresses several commentors' concerns regarding the potential for increased groundwater use to result in unacceptable nitrate concentrations in wells.

5. The City of Sumas, in its 1999 Water System Comprehensive Plan, indicates that in the event of a water shortage, residential customers would have first priority to receive water from the municipal water supply. SE2 understands that the water supply to the plant could be reduced or curtailed in the event of reduced capacity from City wells. The applicant has also agreed that they would mitigate any impairment of water quantity to private wells and water rights within a one-mile radius of the Sumas municipal well field south of the Canadian border that results from the increased pumping required for the S2GF project (Adjudicative Hearing Transcript, testimony by Ms. McGaffey, pages 906 to 910). These provisions are discussed in Section 3.2.5.2 of the FEIS.

   As discussed in the EIS, the City of Sumas intends to put its full water rights to beneficial use. A City of Sumas official indicated that the City determined there is sufficient water available for the next 20 years for other new businesses in addition to SE2. After that, additional water availability is not as certain (Adjudicative Hearing Transcript, testimony by David Davidson, pages 946 to 957).

6. Safeguards regarding the design, construction, operation, and maintenance of the gas pipeline have been set forth in a partial settlement agreement between Washington Utilities and Transportation Commission and SE2 concerning natural gas pipeline issues (see Volume 1, Appendix G of this Final EIS).

7. The bermed area would be lined with a "rubberized plastic" material, as described in the testimony of Michael Woltersdorf (Adjudicative Hearing Transcript, page 1911).

8. As discussed in Letter 3, Response to Comment 2, a detailed air quality impact assessment was prepared for the proposed project using sophisticated modeling

procedures and protocols that were developed in cooperation with technical staff from the Washington Department of Ecology; the Canadian Ministry of the Environment, Lands & Parks; scientists from the University of Washington; and scientists working on behalf of the applicant. As discussed in Letter 3, Response to Comment 2 and the EIS, the air quality impact assessment demonstrated that the proposed facility would meet all applicable air quality regulatory requirements and Canadian air quality objectives.

Acid deposition was evaluated in the Draft EIS. The U.S. Forest Service (USFS) has concluded that annual sulfur deposition fluctuations below 3 kilograms per hectare per year (kg/ha/yr) are unlikely to significantly affect terrestrial ecosystems in Pacific Northwest forests. The USFS also suggests that total nitrogen deposition below 5 kg/ha/yr should cause no damage to forest ecosystems. Modeling for the proposed facility indicates that the maximum annual deposition due to facility emissions would be 0.05 kg/ha/yr for nitrogen and 0.07 kg/ha/yr for sulfur and would occur over a small area on top of Sumas Mountain. The results indicate that the deposition increase due to emissions from the proposed facility is expected to be less than 1.3 percent of average current values for both nitrogen and sulfur and drop to less than 0.4 percent of the standards at a distance of several kilometers from the maximum impact area on Sumas Mountain. As a result, acid deposition is not expected to be exacerbated as a result of the proposed project.

9. Sound emissions are regulated at both the state and local level. The City of Sumas noise ordinance applies essentially the same criteria as the Washington State regulation. These regulations establish limits on the levels and duration of noise crossing property boundaries. Allowable maximum sound levels depend on the zoning of the noise source and the zoning of the receiving property.

   The site layout for the proposed facility has been designed to minimize noise impacts at nearby residential receptors. For example, the cooling tower and condenser were placed south of the turbine buildings to increase the distance to residential areas to the north. In addition, a number of structural measures have been incorporated into the project design including enclosing the gas turbines, turbine generators, and steam turbine in an insulated building, increasing the thickness of stack walls, and erecting noise barriers around the transformers. Such measures will reduce sound levels at all frequencies. (Exhibit 154, page 23).

   Noise modeling did not identify impacts associated with operation of the proposed facility. However, the applicant has committed to additional measures if necessary to further reduce noise levels at offsite locations. In addition, the applicant has committed to including noise performance specifications in its purchase agreements. Noise levels will be measured at startup, and equipment suppliers will be required to retrofit equipment if necessary to meet the performance specification. (Exhibit 25, page 20).

10. Thank you for your comment. Please see Exhibit JW-4 of Volume 1, Appendix G. This exhibit is a wetland delineation and mitigation plan that is part of the agreements between SE2 and the Washington Department of Fish and Wildlife and Department of Ecology. The mitigation is designed to enhance, create, and preserve existing wetlands. A

monitoring plan defining performance standards and monitoring methods would be prepared before the project is implemented. Please also see General Response C.

11. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Therefore, removal of trees along the Nooksack River to install 115 kV lines would not be required.

12. EIS evaluations are intended to focus on rare, threatened, or endangered species, per WAC 197-11-440(6), which defines what level of detail is appropriate for the affected environment of an EIS:

    "*Succinctly describe the principal features of the environment that would be affected, or created, by the alternatives including the proposal under consideration. Inventories of species should be avoided, although rare, threatened, or endangered species should be indicated.*"

    Small mammals were mentioned on page 3.5-10 of the Draft EIS. Loss of habitat for hawks, small mammals, and other wildlife is an unavoidable adverse impact of the project.

13. Effluent would be discharged to the City of Sumas sanitary sewer system and not into areas where wildlife habitat would be affected.

14. Please see Letter 1, Response to Comment 1 regarding extension of the comment period.